

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 18 CR 789
v.)	
)	Hon. Gary Feinerman
DENY MITROVICH)	

SUPPLEMENTAL MEMORANDUM ON RESTITUTION

As noted in the government’s sentencing response brief, eleven victims are requesting restitution in this case and the government and defendant previously reached an agreement with regard to nine of them. Since then, the parties have also reached an agreement on the amount of \$10,000 in restitution for the victim “Tara,” of whom defendant possessed 7 images and 4 videos.

With regard to the victim, “Angela,” the parties have not reached an agreed amount of restitution. Angela’s current request for restitution is \$5,000. Defendant possessed 3 images and 0 videos of Angela. According to materials provided by her attorney, the low and high estimates of her future compensable expenses are \$1,182,625 and \$1,463,125, respectively. Based on data tracked by the Department of Justice, at least approximately 367 defendants have been ordered to pay restitution to Angela, in an amount totaling approximately \$1,284,171.¹ The “1/N” low and high figures are \$3,222.41 and \$3,986.72, respectively.

¹ The DOJ restitution database aims to collect information about federal restitution orders entered in child pornography cases. Data in the database dates back to approximately 2009 or 2010. Data is typically entered into the database by the U.S. Attorneys’ Offices, which are supposed to have processes in place to accomplish that goal. Occasionally, attorneys representing victims in these cases share information about restitution orders, and that information is then cross-checked against the database—with any gaps being filled. The

Respectfully submitted,

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Dated: December 18, 2022

database does not contain any information about restitution actually paid. DOJ employees who administer the database do not believe that it contains 100% of relevant restitution orders since 2009. However, data is regularly entered into the database and steps are taken to attempt to quality control the comprehensiveness and accuracy of the data.